

### III. REMARKS

Claims 1-22 were previously presented for prosecution. By this amendment, claims 1, 10 and 17 have been amended, and claims 4, 13, 14 and 18 have been canceled. Subject matter from these claims has been incorporated into the respective independent claim. Previous claims 1-4, 7-12, and 15-22 were rejected under 35 USC 102(a) as being anticipated by Gunter Ollmann's "Custom HTML Authentication – Best Practices on Securing Custom HTML Authentication Procedures," hereinafter "Ollmann." Claims 5, 6, 13 and 14 were rejected under 35 USC 103(a) as being unpatentable over Ollmann in view of "Securing against Denial of Service Attacks (W3C)." Applicant respectfully traverses the above rejections for the following reasons.

With regard to the rejection of claim 1, the Office continues to maintain that the feature "wherein a request is deemed improper if a message body associated with the request has a zero length," is taught by Ollmann. In the previous Office Action, the Office refers to pages 4-5 and page 8 for making such a teaching. As previously noted, pages 4-5 makes no teaching regarding zero length objects. Page 8 refers to ensuring "that the content of the session ID is of the expected size and type." As already pointed out, a "session ID" is not the same as "request." As such, claim 1 is clearly not anticipated by Ollmann.

Claim 10 now recites "wherein a message is deemed improper if the message is neither an HTTP "post" nor an HTTP "get" command when one of these commands is expected, or the message includes a HTTP "post" or "get" command with unknown arguments." The Office previously alleges that this feature is taught on page 10 of W3C. In particular, the Office alleges that echo requests and echo reply packets teaches this feature. An *echo request* is an ICMP message whose data is expected to be received back in an *echo reply* ("pong"). Thus, the host

must respond to all echo requests with an echo reply containing the exact data received in the request message (see, e.g., Wikipedia). Echo requests and replies are clearly not equivalents of HTTP post or get commands. As such claim 10 is not anticipated.

Claim 17 recites “means for responding to a first improper message from an identified source address with an HTTP error response; means for responding to a first predetermined number of subsequent improper messages from the identified source address with HTTP “OK” response codes; and means for stopping responses to the identified source address after a second predetermined number of subsequent improper messages have been received.” In other words, this claim provides three responses to improper messages. The prior art, in part or in whole fails to teach such an approach.

Applicant respectfully submits that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicant’s undersigned representative at the telephone number listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Hoffman", with a horizontal line extending to the right.

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Michael F. Hoffman  
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